

**IN THE CIRCUIT COURT OF KEMPER COUNTY, MISSISSIPPI**

**PAULA CALLEJAS TREJO, TERESA LUGO  
CALLEJAS, CATALINA LUGO CALLEJAS,  
ANTONIO LUGO CALLEJAS, CLEMENTINA  
LUGO, AND LAURENTINA LUGO,  
INDIVIDUALLY AND AS THE WRONGFUL  
DEATH BENEFICIARIES OF GUILLERMO  
LUGO-  
CALLEJAS, DECEASED**

**PLAINTIFFS**

**VS.**

**CIVIL ACTION NO. 2020-CV-46-BB**

**OVERNIGHT PARTS ALLIANCE, LLC and  
WHOLESALE PARTS ALLIANCE, LLC and  
STEVEN MCKINNEY, INDIVIDUALLY and  
d/b/a OVERNIGHT PARTS ALLIANCE, LLC,  
and PENSKE TRUCK LEASING CO., L.P.**

**DEFENDANTS**

**CLERK'S CERTIFICATION**

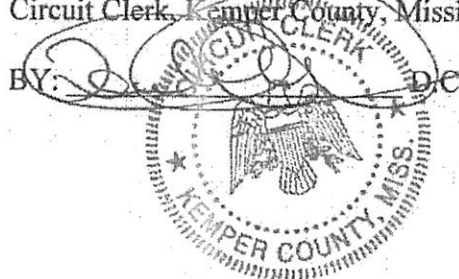
I, Teresa Lugo D.C. Clerk of Kemper County, Mississippi,

hereby certify that the attached are true and correct copies of all papers filed in the above styled  
and numbered cause, as of this date the same is of record in this office to wit:

GIVEN UNDER MY HAND AND SEAL of office, this the 17 day of August,  
2020.

SHIRLEY STEELE JACKSON,  
Circuit Clerk, Kemper County, Mississippi

BY: [Signature] D.C.



**EXHIBIT A**

IN THE CIRCUIT COURT OF KEMPER COUNTY, MISSISSIPPI

FILED  
IN THIS OFFICE

PAULA CALLEJAS TREJO, TERESA LUGO CALLEJAS,  
CATALINA LUGO CALLEJAS, ANTONIA LUGO CALLEJAS,  
CLEMENTINA LUGO, AND LAURENTINA LUGO,  
INDIVIDUALLY AND AS THE HEIRS  
AND WRONGFUL DEATH BENEFICIARIES  
OF GUILLERMO LUGO-CALLEJAS,  
DECEASED

JUN 03 2020

SHIRLEY STEELE JACKSON  
CIRCUIT CLERK  
KEMPER COUNTY, MISS

BY

PLAINTIFFS

VS.

CIVIL ACTION NO. 2020-CV-46 BB

OVERNIGHT PARTS ALLIANCE, LLC and  
WHOLESALE PARTS ALLIANCE, LLC and  
STEVEN MCKINNEY, INDIVIDUALLY and  
d/b/a OVERNIGHT PARTS ALLIANCE, LLC,  
and PENSKE TRUCK LEASING CO., L.P

DEFENDANTS

COMPLAINT

JURY TRIAL DEMANDED

COMES NOW, Plaintiffs, Paula Callejas Trejo, Teresa Lugo Callejas, Catalina Lugo Callejas, Antonia Lugo Callejas, Clementina Lugo, and Laurentina Lugo, individually and as the heirs and wrongful death beneficiaries of Guillermo Lugo-Callejas, Deceased, and files this their Complaint against the Defendants, Wholesale Parts Alliance, LLC, Overnight Parts Alliance, LLC and Steven McKinney, individually and d/b/a Overnight Parts Alliance, LLC, and Penske Truck Leasing Co., L.P., and for cause, would show unto the Court the following facts, to-wit:

The Decedent, Guillermo Lugo-Callejas, was at the time of his death, a citizen of the Country of Mexico. At the time of his death, he was residing at 312 South Jefferson Street, Macon, Noxubee County, Mississippi 39341. At the time of his death he was survived by Paula Callejas Trejo, Teresa Lugo Callejas, Catalina Lugo Callejas, Antonia Lugo Callejas, Clementina Lugo, and Laurentina Lugo, who are his legally designated heirs and wrongful death beneficiaries pursuant to Mississippi law. Plaintiff, Joan Torres, having been the petitioner of heirship filed on behalf of the Plaintiffs, who are resident citizens of the Country of Mexico and reside in Mexico. Said Petitioner, Joan Torres, files in addition on behalf of these wrongful death beneficiaries as allowed by the state law.

#### PARTIES

1.

That the Plaintiffs, Paula Callejas Trejo, Teresa Lugo Callejas, Catalina Lugo Callejas, Antonia Lugo Callejas, Clementina Lugo, and Laurentina Lugo, individually and as the heirs and wrongful death beneficiaries of Guillermo Lugo-Callejas, Deceased, are adult residents of the country of Mexico.

2.

That Defendant, Wholesale Parts Alliance, LLC is a foreign corporation whose principal place of business is in Irondale, Alabama and who may be served with process of service through its' registered agent, Marvin S. Windham, at 210 Automation Way, Irondale, Alabama 35210.

3.

That Defendant, Overnight Parts Alliance, LLC, is a foreign corporation whose principal place of business is in Irondale, Alabama and who may be served with process of

service through its' registered agent, Marvin S. Windham, 210 Automation Way, Irondale, Alabama 35210.

4.

That Defendant, Steven McKinney, is an adult resident citizen of Cullman County, Alabama and resides at 408 Lake Nola, Hayden, Alabama 35079, and he may be served with process of this Honorable Court at this address pursuant to state law, via personal service as an operator and employee of Overnight Parts Alliance, LLC and/or Wholesale Parts Alliance, LLC at the time this action accrued.

5.

Defendant, Penske Truck Leasing, Co., L.P. ("Penske"), is a limited partnership or joint venture of Penske Corporation, Penske Automotive Group, and Mitsui & Co., headquartered in Reading, Pennsylvania. Penske may be served with process of this Court by serving the same upon its registered agent for service of process in the State of Mississippi, to-wit: Corporation Service Company, 7716 Old Canton Road, Suite C, Madison, Mississippi 39110.

#### **JURISDICTION AND VENUE**

6.

Jurisdiction and venue are proper in the Circuit Court of Kemper County Mississippi, as the collision that gives rise to this cause of action occurred in Kemper County, Mississippi.



**FACTS**

7.

That on or about June 3, 2019, Decedent, Guillermo Lugo-Callejas, was traveling in a 15-passenger van owned by Anthony Sharp, in the eastbound lane of Highway 16 near the intersection of Lovers Lane and Highway 16 at or near N 32 49.756 W 088 25.244. The other driver, Steven McKinney, was operating a box truck owned or leased by Wholesale Parts Alliance, LLC and/or Overnight Parts Alliance, LLC, and was traveling westbound on Highway 16 when he crossed over the center line into oncoming traffic and collided head on with the van carrying the Decedent, David Lugo-Callejas. The collision occurred completely in the eastbound lane of traffic and the actions of Defendant McKinney were the sole proximate cause of the collision.

Steven McKinney was an agent and employee of Overnight Parts Alliance, LLC and Wholesale Parts Alliance, LLC and as such, said Defendants are liable for the actions of the Defendant driver.

8.

Penske Truck Leasing Co., L.P. is a commercial business who leases and/or sells commercial box trucks to other commercial entities such as and including Wholesale Parts Alliance, LLC and Overnight Parts Alliance, LLC. Penske provides these vehicles that are customized based on the requirements and/or needs of the Defendant Lessee. This joint enterprise causes independent negligence on behalf of Penske Truck Leasing Co., L.P., specifically identifying causative conduct and/or negligence on behalf of Penske as a provider of the vehicle in question.

**COUNT ONE – NEGLIGENCE**

9.

That the Plaintiffs contend the Defendants, Wholesale Parts Alliance, LLC, Overnight Parts Alliance, LLC, and its employee, Steven McKinney, were jointly, severally and/or concurrently negligent and that such joint, several and/or concurrent negligence proximately caused or contributed to the collision and ultimately to the death of Guillermo Lugo-Callejas.

10.

That the Defendants, Wholesale Parts Alliance, LLC and Overnight Parts Alliance, LLC is vicariously liable for the negligence of its employee, Steven McKinney, who was both acting within the course and scope of his employment at the time of the collision.

11.

That Defendants, Wholesale Parts Alliance, LLC and Overnight Parts Alliance, LLC's employee, Steven McKinney, while acting within the course and scope of his employment, was negligent in the following manner(s):

- a. Failing to control the movement and momentum of his commercial vehicle;
- b. In carelessly and negligently failing to observe the vehicle in which plaintiffs' decedent were riding;
- c. Operating the vehicle in excessive and reckless speed and in violation of Safety Regulations as adopted by the State of Mississippi, pertaining generally to the operation of box trucks and vehicles and particularly in adverse driving conditions;

- d. In violating certain Regulations and laws as adopted by the State of Mississippi which amounts to negligence per se;
- e. Failing to keep proper lookout;
- f. Failure to make a last chance maneuver to avoid striking plaintiffs' decedents' vehicle; and
- g. In willfully and wantonly operating the box truck in such a manner as to evidence a willful disregard for the rights of the traveling public and a willful disregard of the state law.
- h. Driving while impaired in a hazardous, reckless manner or constituting gross negligence.

12.

That at all times complained of herein the Defendants and its' employees were negligent in one or more of the following aspects which caused or proximately contributed to the death of Lugo:

- a. Failing to properly maintain and secure the commercial vehicle and load which struck the plaintiffs' decedents vehicle;
- b. In violation of statutes, regulations, and law as adopted by the State of Mississippi, pertaining generally to the operation of motor vehicles and trucks particularly in said driving conditions;

13.

Plaintiffs would show that at all times relevant hereto, the Defendants, along with Defendant driver, were either licensed through or subject to applicable state law governing

commercial drivers' license. At all times complained of herein, the Defendant was disregarding applicable state law.

14.

Plaintiffs further acknowledge other significant violations and reckless actions on part of the Defendants driver and company regarding the condition of the truck and condition of the river approximately caused and contributed to the collision in question. Plaintiffs further reserve the right to amend these allegations as continued investigation and discovery is ongoing. Said duty amounts to gross negligence.

15.

Defendant, Penske Truck Leasing Co., L.P., has independent liability, separate and distinct from that of the remaining Defendants. Penske is in the specialized business of providing custom vehicles or box trucks to commercial transport companies, such as the Overnight Parts Alliance and Wholesale Parts Alliance Defendants. Penske customizes these trucks specifically to accommodate the needs of said Defendants. In this case, the Defendant, Penske provided a 2020 Sku box truck manufactured by International. Penske knew that the business enterprise in the joint venture with Overnight Parts Alliance, LLC, provided that Overnight would be utilizing these trucks to drive long distances in potentially dangerous conditions with specifically being foreseeable to have drivers that may be fatigued or impaired. Investigation revealed that the driver, Steven McKinney, was extremely fatigued and impaired before and at the time of the collision. Based on the lack of proper alarms, controls or safety devices that were not properly utilized or operating on the truck owned, customized and provided by Penske, the driver was inadequately alarmed and was otherwise



allowed to continue his impaired driving in a reckless and grossly negligent manner and as such the independent negligent actions of Penske in providing this vehicle contributed to the accident and gross negligence of McKinney and Wholesale Parts Alliance, LLC and Overnight Parts Alliance, LLC contributing to the death of Mr. Callejas.

## COUNT TWO

### CAUSATION AND DAMAGES

16.

Plaintiffs re-allege and incorporate by reference all of the above allegations contained in this Complaint and would further allege and show that the actions of the Defendants herein, as complained above, were the proximate cause or proximate contributing cause of the injuries and death of Plaintiffs' decedent, Guillermo Lugo-Callejas.

17.

As the direct and proximate result of the combined and/or concurrent acts and omissions of the Defendants and their employee, Plaintiffs have suffered the loss of association, love, affection, and the loss of enjoyment of life, mental pain and suffering of Plaintiffs and decedent, emotional distress, survival claims, medical, funeral/ burial expenses and all other damages allowed under the Wrongful Death Act as set forth in the Mississippi Code of 1972 Annotated as Amended, and other claims as allowable for the actions aforesaid pursuant to Mississippi law.

**COUNT THREE**

**WANTON, RECKLESS, MALICIOUS OR WRONGFUL  
CONDUCT IN GROSS DISREGARD FOR OTHERS RIGHTS**

18.

Plaintiffs re-adopt, re-allege and incorporate each and every allegation set forth in the paragraphs preceding herein and makes the same a part of this Count.

19.

Plaintiffs contend Defendants and their employees were herein grossly negligent as previously stated in this Complaint which includes reckless operation while driving. Moreover, the defendants were in blatant violation of regulations adopted by the state of Mississippi which caused or contributed to the death of Guillermo Lugo-Callejas and for which punitive damages should be awarded. Such actions/inactions and gross negligence place the traveling public at an extreme risk and therefore punitive damages, as allowed by law, should be awarded to prevent such occurrences in the future.

20.

Specifically, Defendant businesses Overnight Parts Alliance, LLC and Wholesale Parts Alliance, LLC, is in the business of delivering automobile parts traveling over large distances and delivering these parts in what is advertised as an expedited manner. Plaintiffs believe the actions on the parts of the Defendants in allowing a fatigued and impaired driver delivering these parts overnight under these facts amounted to gross negligence or reckless operation of a commercial vehicle. Specifically, the facts will reveal before the accident, the

Defendant Steven McKinney was fatigued and/or possibly impaired while driving the vehicle and at least in the approximately five (5) miles before the accident, had repeatedly fallen asleep or was fatigued and driving in a reckless and dangerous manner. All Defendants knew or should have known of his impaired condition created an inherently dangerous situation which ultimately caused the death of Guillermo Lugo-Callejas. The conduct on the part of the Defendants in advertising and using their business to expeditiously deliver parts over long distances created a heightened duty to take precautions to prevent fatigued drivers who are driving for extended overnight periods. In this case, the Defendant driver was caused and allowed to drive in a fatigued, impaired manner, without proper precautions to prevent such needless, inherently dangerous conditions which proximately caused or contributed to the Decedent's death.

21.

The Defendants, Overnight Parts Alliance, LLC, Wholesale Parts Alliance, LLC, Steven McKinney and Penske Truck Leasing Co., L.P., actions aforesaid proximately caused the collision in question which resulted in the death of Guillermo Lugo-Callejas

WHEREFORE, PREMISES CONSIDERED, Plaintiffs, Paula Callejas Trego, Teresa Lugo Callejas, Catalina Lugo Callejas, Antonia Lugo Callejas, Clementina Lugo, and Laurentina Lugo, the heirs and wrongful death beneficiaries of Guillermo Lugo-Callejas, Deceased, demand judgment of and from the Defendants, Wholesale Parts Alliance, LLC, Overnight Parts Alliance, LLC, Penske Truck Leasing Co., L.P. and Steven McKinney, individually and d/b/a Overnight Parts Alliance, LLC in an amount for actual and punitive

damages to be determined by a jury along with pre-judgment and post-judgment interest, as well as attorney fees and all costs of this action.

Plaintiffs request such other relief as they may be entitled in the premises.

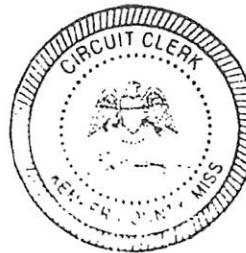
THIS the 3 day of Sum, 2020.

RESPECTFULLY SUBMITTED,  
ERNESTINA MARTINEZ, MARIA  
TERESA LUGO MARTINEZ, AND  
ERIKA LUGO MARTINEZ, THE  
WRONGFUL DEATH  
BENEFICIARIES OF GUILLERMO  
LUGO-CALLEJAS, DECEASED

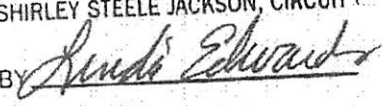
BY:   
JOHN H. STEVENS (MSB #8528)

OF COUNSEL:

JIM GRENFELL (MSB #8528)  
GRENFELL & STEVENS  
P.O. BOX 16570  
Jackson, MS 39236-6570  
Telephone: (601) 366-1900  
Facsimile: (601) 366-1799  
Email: [jstevens91@aol.com](mailto:jstevens91@aol.com)



STATE OF MISSISSIPPI  
KEMPER COUNTY

I CERTIFY THAT THIS IS A TRUE  
AND CORRECT COPY  
SHIRLEY STEELE JACKSON, CIRCUIT  
BY 



<b>COVER SHEET</b>		Court Identification Docket #		Case Year	Docket Number
<b>Civil Case Filing Form</b> (To be completed by Attorney/Party Prior to Filing of Pleading)		85	J	17	2020
		County #	Judicial District	Court ID (CH, CI, CO)	Local Docket ID
		06	10	32	0
		Month	Date	Year	
		This area to be completed by clerk			Case Number if filed prior to 1/1/94
In the CIRCUIT		Court of	KEMPER		County
		Judicial District			
<b>Origin of Suit (Place an "X" in one box only)</b>					
<input checked="" type="checkbox"/> Initial Filing	<input type="checkbox"/> Reinstated	<input type="checkbox"/> Foreign Judgment Enrolled	<input type="checkbox"/> Transfer from Other court	<input type="checkbox"/> Other	
<input type="checkbox"/> Remanded	<input type="checkbox"/> Reopened	<input type="checkbox"/> Joining Suit/Action	<input type="checkbox"/> Appeal		
<b>Plaintiff - Party(ies) Initially Bringing Suit Should Be Entered First - Enter Additional Plaintiffs on Separate Form</b>					
<b>Individual</b> Trejo Paula Callejas					
Last Name		First Name		Maiden Name, if applicable	M.I. Jr/Sr/III/IV
Check (x) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____					
Check (x) if Individual Plaintiff is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____					
<b>Business</b>					
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated					
Check (x) if Business Plaintiff is filing suit in the name of an entity other than the above, and enter below: D/B/A _____					
<b>Address of Plaintiff</b>					
Attorney (Name & Address) John H. Stevens, 1535 Leila Drive, Jackson, MS 39236					MS Bar No. 8528
Check (x) if Individual Filing Initial Pleading is NOT an attorney					
Signature of Individual Filing: _____					
<b>Defendant - Name of Defendant - Enter Additional Defendants on Separate Form</b>					
<b>Individual</b>					
Last Name		First Name		Maiden Name, if applicable	M.I. Jr/Sr/III/IV
Check (x) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style: Estate of _____					
Check (x) if Individual Defendant is acting in capacity as Business Owner/Operator (d/b/a) or State Agency, and enter entity: D/B/A or Agency _____					
<b>Business</b> Overnight Parts Alliance, LLC					
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate the state where incorporated					
Check (x) if Business Defendant is acting in the name of an entity other than the above, and enter below: D/B/A _____					
Attorney (Name & Address) - If Known					MS Bar No.
Check (x) if child support is contemplated as an issue in this suit. *If checked, please submit completed Child Support Information Sheet with this Cover Sheet.					
<b>Nature of Suit (Place an "X" in one box only)</b>					
<b>Domestic Relations</b>		<b>Business/Commercial</b>		<b>Children/Minors - Non-Domestic</b>	
<input type="checkbox"/> Child Custody/Visitation	<input type="checkbox"/> Accounting (Business)	<input type="checkbox"/> Adoption - Contested	<input type="checkbox"/> Adoption - Uncontested	<input type="checkbox"/> Consent to Abortion	
<input type="checkbox"/> Child Support	<input type="checkbox"/> Business Dissolution	<input type="checkbox"/> Minor Removal of Minority	<input type="checkbox"/> Other		
<input type="checkbox"/> Contempt	<input type="checkbox"/> Debt Collection	<b>Civil Rights</b>			
<input type="checkbox"/> Divorce: Fault	<input type="checkbox"/> Employment	<input type="checkbox"/> Elections	<input type="checkbox"/> Expungement		
<input type="checkbox"/> Divorce: Irreconcilable Diff.	<input type="checkbox"/> Foreign Judgment	<input type="checkbox"/> Habeas Corpus	<input type="checkbox"/> Post Conviction Relief/Prisoner		
<input type="checkbox"/> Domestic Abuse	<input type="checkbox"/> Garnishment	<input type="checkbox"/> Other			
<input type="checkbox"/> Emancipation	<input type="checkbox"/> Replevin	<b>Contract</b>			
<input type="checkbox"/> Modification	<input type="checkbox"/> Other	<input type="checkbox"/> Breach of Contract	<input type="checkbox"/> Installment Contract		
<input type="checkbox"/> Paternity	<b>Probate</b>		<input type="checkbox"/> Insurance	<input type="checkbox"/> Specific Performance	
<input type="checkbox"/> Property Division	<input type="checkbox"/> Accounting (Probate)	<input type="checkbox"/> Birth Certificate Correction	<input type="checkbox"/> Other		
<input type="checkbox"/> Separate Maintenance	<input type="checkbox"/> Mental Health Commitment	<b>Statutes/Rules</b>			
<input type="checkbox"/> Term. of Parental Rights-Chancery	<input type="checkbox"/> Conservatorship	<input type="checkbox"/> Bond Validation	<input type="checkbox"/> Civil Forfeiture		
<input type="checkbox"/> UIFSA (eff 7/1/97; formerly URESA)	<input type="checkbox"/> Guardianship	<input type="checkbox"/> Declaratory Judgment	<input type="checkbox"/> Injunction or Restraining Order		
<input type="checkbox"/> Other	<input type="checkbox"/> Joint Conservatorship & Guardianship	<input type="checkbox"/> Other			
<b>Appeals</b>		<input type="checkbox"/> Heirship	<input type="checkbox"/> Other		
<input type="checkbox"/> Administrative Agency	<input type="checkbox"/> Intestate Estate	<input type="checkbox"/> Wrongful Death			
<input type="checkbox"/> County Court	<input type="checkbox"/> Minor's Settlement	<input type="checkbox"/> Other			
<input type="checkbox"/> Hardship Petition (Driver License)	<input type="checkbox"/> Muniment of Title				
<input type="checkbox"/> Justice Court	<input type="checkbox"/> Name Change				
<input type="checkbox"/> MS Dept Employment Security	<input type="checkbox"/> Testate Estate				
<input type="checkbox"/> Municipal Court	<input type="checkbox"/> Will Contest				
<input type="checkbox"/> Other	<input type="checkbox"/> Alcohol/Drug Commitment (voluntary)				
		<b>Real Property</b>		<b>Torts</b>	
		<input type="checkbox"/> Adverse Possession	<input type="checkbox"/> Bad Faith		
		<input type="checkbox"/> Ejectment	<input type="checkbox"/> Fraud		
		<input type="checkbox"/> Eminent Domain	<input type="checkbox"/> Intentional Tort		
		<input type="checkbox"/> Eviction	<input type="checkbox"/> Loss of Consortium		
		<input type="checkbox"/> Judicial Foreclosure	<input type="checkbox"/> Malpractice - Legal		
		<input type="checkbox"/> Lien Assertion	<input type="checkbox"/> Malpractice - Medical		
		<input type="checkbox"/> Partition	<input type="checkbox"/> Mass Tort		
		<input type="checkbox"/> Tax Sale: Confirm/Cancel	<input type="checkbox"/> Negligence - General		
		<input type="checkbox"/> Title Boundary or Easement	<input checked="" type="checkbox"/> Negligence - Motor Vehicle		
		<input type="checkbox"/> Other	<input type="checkbox"/> Premises Liability		
			<input type="checkbox"/> Product Liability		
			<input type="checkbox"/> Subrogation		
			<input checked="" type="checkbox"/> Wrongful Death		
			<input type="checkbox"/> Other		



Docket No. 2000 - 44 BB Docket No. If Filed  
File Yr Chronological No. Clerk's Local ID Prior to 1/1/94

**Plaintiff #2:**

Individual: Callejas Teresa ( ) L

Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

**Business** \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A

ATTORNEY FOR THIS PLAINTIFF: 8528 Bar # or Name: John H. Stevens Pro Hac Vice (✓) Not an Attorney(✓)

**Plaintiff #3:**

Individual: Callejas Catalina ( ) L  
Last Name First Name Maiden Name, if Applicable Middle Init.

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

**Business** \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 8528 Bar # or Name: John H. Stevens Pro Hac Vice (✓) Not an Attorney(✓)

**Plaintiff #4:**

Individual: Callejas Antonia (  ) L   
Last Name First Name Maiden Name, if Applicable Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of

\_\_\_\_ Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

**Business** \_\_\_\_\_  
Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS PLAINTIFF: 8528 Bar # or Name: John H. Stevens Pro Hac Vice (☒) Not an Attorney(☒)

IN THE CIRCUIT ☒ COURT OF KEMPER ☒ COUNTY, MISSISSIPPI10 ☒ JUDICIAL DISTRICT, CITY OF DokahDocket No. 200File Yr 46Chronological No. 46Clerk's Local ID 03

Docket No. If Filed

Prior to 1/1/94

PLAINTIFFS IN REFERENCED CAUSE - Page    of    Plaintiffs Pages  
IN ADDITION TO PLAINTIFF SHOWN ON CIVIL CASE FILING FORM COVER SHEETPlaintiff # 5 :Individual: Lugo Last Name Clementina First Name (    Maiden Name, if Applicable ) Middle Init. Jr/Sr/III/IV   Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:Estate of      Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:D/B/A   Business   

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

   Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:D/B/A   ATTORNEY FOR THIS PLAINTIFF: 8528 Bar # or Name: John H. Stevens Pro Hac Vice (✓)    Not an Attorney(✓)   Plaintiff # 6 :Individual: Lugo Last Name Laurentina First Name (    Maiden Name, if Applicable ) Middle Init. Jr/Sr/III/IV   Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:Estate of      Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:D/B/A   Business   

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

   Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:D/B/A   ATTORNEY FOR THIS PLAINTIFF: 8528 Bar # or Name: John H. Stevens Pro Hac Vice (✓)    Not an Attorney(✓)   Plaintiff #    :Individual:    Last Name    First Name (    Maiden Name, if Applicable ) Middle Init. Jr/Sr/III/IV   Check (✓) if Individual Plaintiff is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:Estate of      Check (✓) if Individual Plaintiff is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:D/B/A   Business   

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

   Check (✓) if Business Plaintiff is filing suit in the name of an entity other than the name above, and enter below:D/B/A   ATTORNEY FOR THIS PLAINTIFF:    Bar # or Name:    Pro Hac Vice (✓)    Not an Attorney(✓)



IN THE CIRCUIT ☒ COURT OF KEMPER ☒ COUNTY, MISSISSIPPI10 ☒ JUDICIAL DISTRICT, CITY OF De KalbDocket No. 2000 - 46 BB  
File Yr Chronological No. Clerk's Local IDDocket No. If Filed  
Prior to 1/1/94 \_\_\_\_\_DEFENDANTS IN REFERENCED CAUSE - Page 1 of \_\_\_\_ Defendants Pages  
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET

## Defendant #2:

Individual: \_\_\_\_\_  
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business Wholesale Parts Alliance, LLC

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_ Not an Attorney(✓) \_\_\_\_

## Defendant #3:

Individual: McKinney Steven \_\_\_\_\_  
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

✓ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A Overnight Parts Alliance, LLC

Business \_\_\_\_\_

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_ Not an Attorney(✓) \_\_\_\_

## Defendant #4:

Individual: \_\_\_\_\_  
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business Penske Truck Leasing Co., L.P.

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_\_ Not an Attorney(✓) \_\_\_\_



IN THE CIRCUIT ☒ COURT OF KEMPER ☒ COUNTY, MISSISSIPPI10 ☒ JUDICIAL DISTRICT, CITY OFDocket No. 2020 - 140

File Yr

Chronological No.

Clerk's Local ID

Docket No. If Filed

Prior to 1/1/94

**DEFENDANTS IN REFERENCED CAUSE - Page \_\_\_ of \_\_\_ Defendants Pages  
IN ADDITION TO DEFENDANT SHOWN ON CIVIL CASE FILING FORM COVER SHEET**

Defendant # \_\_\_ :

Individual: \_\_\_\_\_  
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_ Not an Attorney(✓) \_\_\_

Defendant # \_\_\_ :

Individual: \_\_\_\_\_  
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_ Not an Attorney(✓) \_\_\_

Defendant # \_\_\_ :

Individual: \_\_\_\_\_  
Last Name First Name (Maiden Name, if Applicable) Middle Init. Jr/Sr/III/IV

\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Executor(trix) or Administrator(trix) of an Estate, and enter style:

Estate of \_\_\_\_\_

\_\_\_ Check (✓) if Individual Defendant is acting in capacity as Business Owner/Operator (D/B/A) or State Agency, and enter that name below:

D/B/A \_\_\_\_\_

Business \_\_\_\_\_

Enter legal name of business, corporation, partnership, agency - If Corporation, indicate state where incorporated

\_\_\_ Check (✓) if Business Defendant is being sued in the name of an entity other than the name above, and enter below:

D/B/A \_\_\_\_\_

ATTORNEY FOR THIS DEFENDANT: \_\_\_\_\_ Bar # or Name: \_\_\_\_\_ Pro Hac Vice (✓) \_\_\_ Not an Attorney(✓) \_\_\_

**CHILD SUPPORT INFORMATION SHEET***Please include all information known*IN THE CIRCUIT ☒ COURT OF KEMPER ☒ COUNTY, MISSISSIPPI☒ JUDICIAL DISTRICT, CITY OF \_\_\_\_\_Docket No. \_\_\_\_\_ - \_\_\_\_\_  
File Yr Chronological No. Clerk's Local ID Docket No. If Filed  
Prior to 1/1/94 \_\_\_\_\_**Father:** \_\_\_\_\_  
Last First M/I Jr/Sr etc. Date of Birth Social Security #Address: \_\_\_\_\_ ( ) \_\_\_\_\_  
Phone # Drivers License #Employer Name and Address: \_\_\_\_\_ ( ) \_\_\_\_\_  
Employer Phone #**Mother:** \_\_\_\_\_  
Last First M/I Jr/Sr etc. Date of Birth Social Security #Address: \_\_\_\_\_ ( ) \_\_\_\_\_  
Phone # Drivers License #Employer Name and Address: \_\_\_\_\_ ( ) \_\_\_\_\_  
Employer Phone #**Child:** \_\_\_\_\_  
Last First M/I Jr/Sr etc. Date of Birth Social Security #Address: \_\_\_\_\_ ( ) \_\_\_\_\_  
Phone #**Child:** \_\_\_\_\_  
Last First M/I Jr/Sr etc. Date of Birth Social Security #Address: \_\_\_\_\_ ( ) \_\_\_\_\_  
Phone #**Child:** \_\_\_\_\_  
Last First M/I Jr/Sr etc. Date of Birth Social Security #Address: \_\_\_\_\_ ( ) \_\_\_\_\_  
Phone #**Child:** \_\_\_\_\_  
Last First M/I Jr/Sr etc. Date of Birth Social Security #Address: \_\_\_\_\_ ( ) \_\_\_\_\_  
Phone #

FOR ADDITIONAL CHILDREN, PLEASE ATTACH ADDITIONAL FORMS

MANDATED PURSUANT TO:  
Federal Social Security Act Title IV-D,  
§§ 454(26)(A) and 454A(e)(4);  
Miss. Code Ann. §43-19-31(l)(iii) (Supp. 1999)Information will be sent to the  
ADMINISTRATIVE OFFICE OF COURTS AND  
MDHS CHILD SUPPORT ENFORCEMENT DIVISION